

1 there where she said hairstylist for ten years or she
2 met -- or next whatever -- whatever said I would
3 probably put in -- the next -- next part of the
4 conversation is -- I have to go back and look -- but I
5 would -- I would just put in a note there and the
6 things -- and then I would -- again, I would expand on
7 those --

8 Q Okay.

9 A -- as far as building my -- building my
10 notes.

11 Q Okay.

12 A Building my report notes.

13 Q So the first time you would have tried to
14 note down either typing or with a pen or a pencil or a
15 magic marker or a crayon or anything what Ms. [REDACTED]
16 told you would have been at least six and a half hours
17 after the interview had ended?

18 A No, sir. I -- like I say, I -- 3:00 o'clock
19 -- I say four, four and a half.

20 Q Well, 9:00 o'clock to -- to 3:30 would be
21 six and a half, right?

22 A Yes, sir, it would be.

23 Q So -- so at least six and a half hours
24 elas -- elapsed between the time the interview ended
25 and you started putting anything down?

1 **A Some time in between that.**

2 Q Okay. And at 3:30 in the morning you're not
3 sure you were taking -- started that at all? You're
4 just guessing?

5 **A I'm not guessing.**

6 Q You're not guessing?

7 **A No. I'm saying it probably was about that**
8 **time when I got up, about 3:30.**

9 Q And -- and are you definitive that when you
10 got up at somewhere around 3:30 you started typing?

11 **A Absolutely, sir.**

12 Q You had your laptop with you?

13 **A Yes, sir.**

14 Q Okay. You started typing and at that point
15 you just typed little tidbits. Is that what you said?

16 **A That's what I was doing.**

17 Q Okay. So you didn't write a full report --

18 **A No. No, sir.**

19 Q You weren't writing complete sentences or
20 anything?

21 **A No, sir.**

22 Q Okay. And how was it you were able to
23 remember what she told you during the interview six
24 and a half hours earlier?

25 **A Mr. Martin, I just have a knack for just --**

1 just remembering what was said to me. That's why I go
2 and write my reports as it is. I don't make a lot of
3 -- I write them as I recall them so -- and that's just
4 the way it's been.

5 Q Okay. Do you remember the first five
6 questions that I asked you during this deposition?

7 A You asked me about the documents and had I
8 seen the exhibit -- those --

9 Q Well, I'm asking specifically. Do you
10 remember the specific questions that I asked you just
11 a few hours earlier this morning?

12 A No, sir, I didn't.

13 Q So you don't really have a memory that
14 remembers the details of what went on, do you?

15 A For that particular interview, yes, sir, I
16 do.

17 Q Well, why are you so confident of that?

18 A Because I listen to what she had to say, and
19 I -- and I guarantee that that's what she told me.

20 Q You guarantee it?

21 A I'm confident, sir. I am confident.

22 Q And so what -- when did you go back next to
23 make further additions or modifications to this
24 document that you were adding tidbits of thought to?

25 A Any time between -- off and on -- any time

1 between the time I started until I finally sent -- I
2 finally made -- made my -- my -- made my final report
3 on those -- on those -- on that interview. It's gone.
4 Slouch down, huh.

5 Q Okay. So -- so how much time exactly --
6 January 30th is when you started, and we didn't get
7 them until March. We didn't get your report on
8 Ms. [REDACTED] until March. So was it over a month or
9 really over two months that it took you to finish that
10 report?

11 A Yes, sir.

12 Q And all that time you relied on nothing but
13 your memory?

14 A Yes, sir.

15 Q And how long was the report when you first
16 put in the tidbits on January 30th?

17 A Probably page, page and a half of just
18 bullet -- just my little tidbit notes.

19 Q Okay. Just bullets, that's it?

20 A Yeah. It -- it -- it discussed, like I
21 said, date, times and -- and just her comments -- the
22 comments she made.

23 Q So between January 30th and March were you
24 doing other work besides drafting this report of
25 interview of [REDACTED]?